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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO FILE
PUBLIC VERSIONS OF RECORDS
PURSUANT TO SEALING ORDER (Dkt.
354)**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al.
2 (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively, the “Parties” submit this joint
3 stipulation.

4 WHEREAS, on January 3, 2024, the Court issued its Order (Dkt. 353) granting in part and
5 denying in part the Parties’ motions to seal papers filed with Plaintiffs’ class certification motion
6 and Google’s *Daubert* motion (Dkts 338, 339).

7 WHEREAS, on January 4, 2024, the Court noticed a January 18, 2024 deadline for the
8 Parties to file public versions of records in line with the sealing order;

9 WHEREAS, the Parties agreed to exchange these materials with one another on January
10 15, in advance of the filing deadline, so that each Party could review the records proposed to be
11 filed publicly;

12 WHEREAS, consistent with that agreement, Plaintiffs on January 15 sent Google copies of
13 the records that Plaintiffs intend to file;

14 WHEREAS, Google has requested additional time to review those materials and prepare
15 its own materials to be filed;

16 WHEREAS, Google seeks an extension of one week for the Parties to file public versions
17 of records in line with the sealing order, from January 18, 2024 to January 25, 2024;

18 WHEREAS, Plaintiffs do not oppose Google’s request for an extension;

19 WHEREAS, the requested extension is made without prejudice to either party seeking a
20 further extension of time should the circumstances warrant and to the extent appropriate;

21 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
22 Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that the deadline for the
23 Parties to file public versions of records in line with the sealing order be extended to January 25,
24 2024.

25 A Proposed Order is submitted concurrently herewith.

26 IT IS SO STIPULATED.
27
28

1 DATED: January 18, 2024

WILLKIE FARR & GALLAGHER, LLP

2 By: /s/ Benedict Y. Hur

3 Benedict Y. Hur

4 *Attorneys for Defendant Google LLC*

5
6 DATED: January 18, 2024

By: /s/ Mark Mao

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: January 18, 2024

WILLKIE, FARR & GALLAGHER LLP

/s/ Benedict Y. Hur
Benedict Y. Hur

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Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING
GOOGLE'S REQUEST TO EXTEND
TIME TO FILE PUBLIC VERSIONS OF
RECORDS PURSUANT TO SEALING
ORDER (Dkt. 354)**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

**[PROPOSED] ORDER GRANTING REQUEST TO EXTEND TIME TO FILE PUBLIC VERSIONS OF
RECORDS**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the new deadline for the Parties to file public versions of records in line with the sealing order (Dkt. 353) be extended to January 25, 2024.

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg